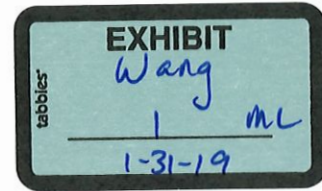


Exhibit U1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



EASTERN PROFIT CORPORATION LIMITED,

Plaintiff-Counterclaim Defendant,

vs.

STRATEGIC VISION US, LLC,

Defendant-Counterclaim Plaintiff,

vs.

GUO WENGUI a/k/a Miles Kwok,

Counterclaim Defendant.

**STRATEGIC VISION'S
NOTICE OF 30(b)(6)
DEPOSITION TO
PLAINTIFF**

Case No. 18-cv-2185


PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. Rule 30(b)(6), defendant-counterclaim plaintiff, Strategic Vision US, LLC ("Strategic Vision"), will take the deposition of plaintiff, Eastern Profit Corporation Limited ("Eastern"), through one or more officers, directors or other representatives who shall be designated to testify on Eastern's behalf regarding all information known or reasonably available to Eastern with respect to the subject matters identified in Attachment A. Strategic Vision requests that Eastern provide written notice at least ten (10) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on Eastern's behalf.

This deposition shall commence at 9:30 a.m. on January 31, 2019 at the office of Phillips Lytle LLP, 340 Madison Avenue, 17th Floor, New York, New York, or at such other time and location as agreed upon by the parties, and shall be taken before a duly

certified court reporter and notary public or other person authorized by law to administer oaths. The deposition will be recorded by stenographic means.

Dated: December 18, 2018
New York, New York

PHILLIPS LYTLE LLP

By 

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Heather H. Kidera

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Plaintiff

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Doc #05-519769

ATTACHMENT A

In accordance with FRCP 30(b)(6), Strategic Vision designates the matters identified below for examination. In construing these topics, the following instructions and definitions shall apply:

- A. All terms shall be construed to encompass as broad a range of information as permitted under the Federal Rules of Civil Procedure.

The deponent(s) shall be prepared to address the following topics:

1. The Research Agreement signed on or about January 6, 2018 between Eastern and Strategic Vision (the "Agreement"), including negotiations concerning same.
2. The corporate structure of Eastern, including its principals and affiliation with counterclaim defendant Guo Wengui ("Mr. Guo").
3. The corporate structure of ACA Capital Group Limited, including its principals and affiliation with Eastern and/or Mr. Guo.
4. Eastern's performance under the Agreement, including (i) all information provided by Eastern to Strategic Vision; and (ii) Eastern's adherence to Strategic Vision's directives.
5. Strategic Vision's performance under the Agreement.
6. Eastern's termination of the Agreement.
7. The \$1 million payment to Strategic Vision pursuant to the Agreement.